

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:)	
MICHAEL BRENNAN, AND)	CASE NO.: 24-12904-amc
RAFFAEL A TUCK-BRENNEN,)	CHAPTER 13
)	JUDGE ASHELY M. CHAN
DEBTORS.)	
)	
WILMINGTON SAVINGS FUND SOCIETY, FSB, AS)	
INDENTURE TRUSTEE, FOR THE AT LX 2024-RPL1)	
TRUST MORTGAGE-BACKED NOTES, SERIES)	
2024-RPL1 AS SERVICED BY NEWREZ LLC D/B/A)	
SHELLPOINT MORTGAGE SERVICING,)	
)	
CREDITOR.)	
)	
MICHAEL BRENNAN AND RAFFAEL A TUCK-)	
BRENNAN, DEBTORS, AND)	
SCOTT F. WATERMAN, TRUSTEE,)	
)	
RESPONDENTS.)	

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Wilmington Savings Fund Society, FSB, as indenture trustee, for the AT LX 2024-RPL1 Trust Mortgage-Backed Notes, Series 2024-RPL1 as serviced by NewRez LLC d/b/a Shellpoint Mortgage Servicing has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **March 26, 2025**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to Movant's attorney:

Joshua I. Goldman, Esq.
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, the United States Bankruptcy Judge, United States Bankruptcy Court, in Courtroom 4, at 900 Market Street, Philadelphia, PA 19107 on **April 9, 2025 at 11:00am.** as soon thereafter as counsel can be heard, to consider the motion.

4. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

5. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

Dated: March 12, 2025

/s/ Joshua I. Goldman
Joshua I. Goldman, Esq.
Pennsylvania Bar # 205047
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6267 Old Water Oak Road, Suite 203
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(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
josh.goldman@padgettlawgroup.com
Counsel for Movant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to the parties on the List by electronic notice and/or by First Class U.S. Mail on this the 12th day of March 2025:

VIA U.S. MAIL

DEBTORS

MICHAEL BRENNAN
RAFFAEL A TUCK-BRENNAN
7055 PASCHALL AVENUE
PHILADELPHIA, PA 19142

VIA ELECTRONIC NOTICE

ATTORNEYS FOR DEBTOR

BRAD J. SADEK
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BRAD@SADEKLAW.COM

TRUSTEE

SCOTT F. WATERMAN [CHAPTER 13]
CHAPTER 13 TRUSTEE
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SUITE 100
READING, PA 19606
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U.S. TRUSTEE

UNITED STATES TRUSTEE
OFFICE OF UNITED STATES TRUSTEE
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/s/ Joshua I. Goldman

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